

PSJ3
Exhibit 562



Document Title	Issue Date	Document Number	
SALES – EARLY DIALOGUE	12/22/08	HSCSQRA-SAD-C005	
Org. Office	Previous Issue	Page	Change Number
Healthcare Supply Chain Services Transportation and Warehouse Operations	New	[PAGE 1*] MERGEFORM AT THE PAGE 1*	DCN-2290

1.0 PURPOSE The Federal Controlled Substances Act requires pharmaceutical wholesalers to maintain effective controls to guard against the diversion of controlled substances. As part of this requirement, Cardinal Health has developed a Suspicious Order Monitoring (SOM) program to identify orders of unusual size, pattern, and/or frequency. This policy provides process requirements for the continuous monitoring and reporting of customer order activities by Sales during the execution of the SOM program. This process focuses on “early dialogue” activities.

2.0 SCOPE This policy applies to Quality & Regulatory Affairs; Supply Chain Integrity; Cardinal Sales.

3.0 INCLUDED ATTACHMENTS AND FORMS None

4.0 POLICY The Anti-Diversion team, within QRA, Supply Chain Integrity, is responsible for the continuous reporting of threshold events identified during the execution of the Suspicious Order Monitoring (SOM) program. The reporting encompasses two components: 1) Internal reports that assist in the evaluation of threshold events; and 2) communication of the threshold events to the Sales department.

4.1 Definitions

Held Order A held order occurs when a customer’s accrual for a drug family in a given month surpasses the assigned QRA threshold limit. When this occurs, the order that exceeds the threshold limit is held pending Regulatory Review. Any subsequent orders submitted by the customer within the same drug family as the held order are also held, unless the threshold is increased by QRA, or unless the accrual is reset to zero at the beginning of a month.

Threshold Event Is defined as the initial held order created by a DEA #, Base Code, Threshold Limit combination.

DEA Limit Over Threshold Report A report generated by members of IT that contains all threshold events from a specified date.

Customer Profile A report generated by QRA that contains various background, licensing, and analytical metrics relevant to the customer that assist in the evaluation of threshold events

Distrack Held Order Report A report generated by QRA that contains all current orders held as a result of the customer’s accrual for a drug family exceeding the assigned QRA threshold limit.

4.2 Process Map

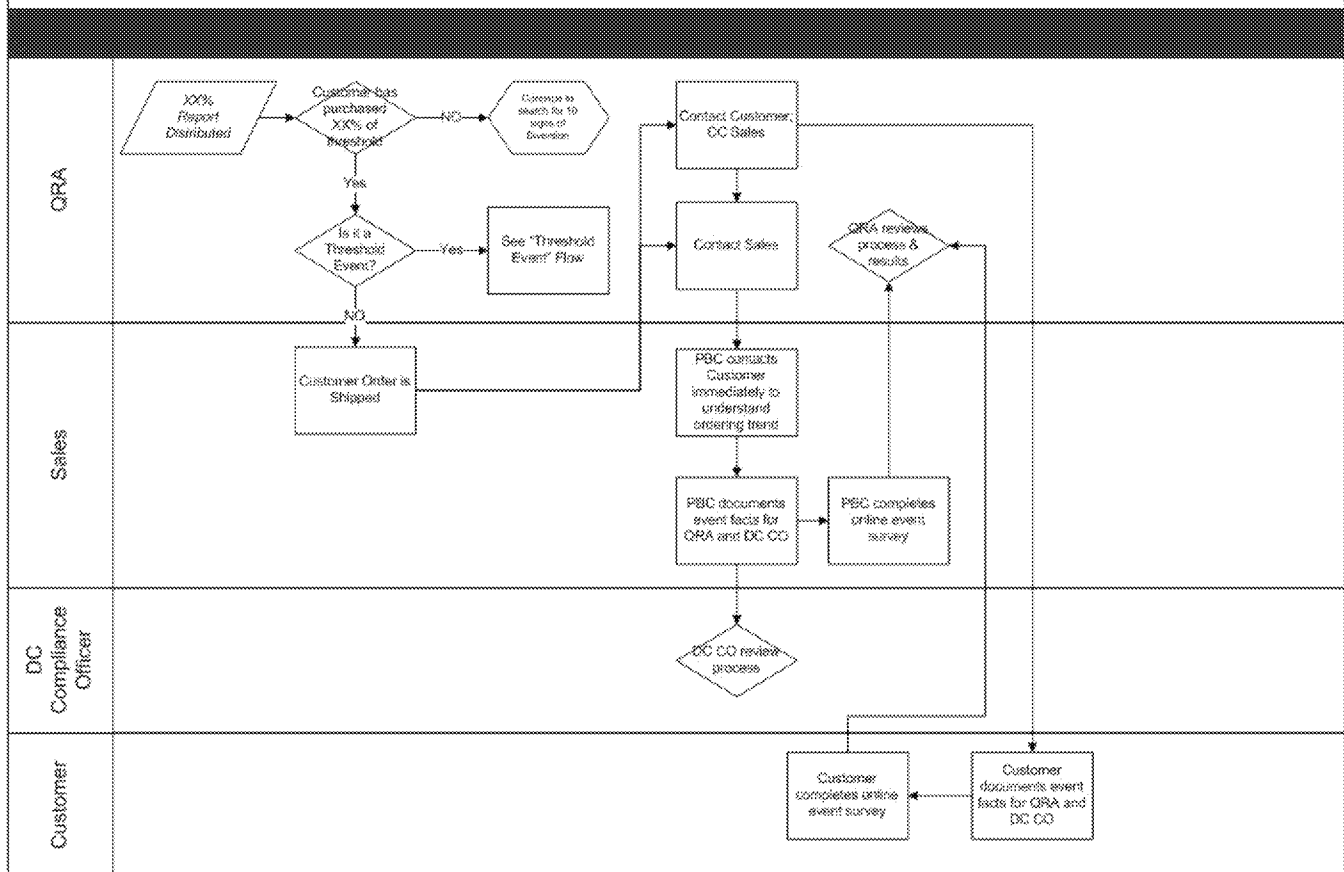
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Org. Office	Previous Issue	Page	Change Number
Healthcare Supply Chain Services Transportation and Warehouse Operations	New	[PAGE 1* MERGEFORM AT 11 PAGE 1*]	DCN-2290

Cardinal Health Anti-Diversion Standard Operating Procedure: Early Dialogue



4.3 Procedures for Reporting

The following procedures outline the process for the salesperson performing an early dialogue with a customer.

4.3.1 Early Dialogue

1. If QRA determines that a customer's order is close to a threshold but is not a threshold event, the order will be shipped and the salesperson will be notified. Notification may be made directly to the salesperson or to the customer with a cc to the salesperson.
2. If QRA contacts a salesperson regarding a close to threshold event directly the salesperson must immediately contact the customer in question to understand the trend and/or data that explains the current order. Examples of such trends or data are: seasonality, new business contracts, change in business models, purchase of files, relocations, etc.
3. The salesperson must document relevant facts, and complete the online

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survey at [HYPERLINK "https://my.cardinalhealth.net/CustomerVisit"]{-
HYPERLINK "https://my.cardinalhealth.net/CustomerVisit" }.

4. If salesperson is copied on a notification sent directly to the customer, then the salesperson is required to follow up with the customer to ensure that the customer provides required information explaining the current order.
5. The salesperson must document all information collected on the online survey.

4.3 Responsibility On an on-going, continuous basis, each individual Sales Representative is responsible for the execution of this SOP

5.0 APPLICABLE DOCUMENTS

[HYPERLINK Sales – Highlight Report

"http://internal.mps.cardinal
.net/teams/qradocs/usdistrib
ution/SOPs/HSCSQRA/SA
D/HSCSQRA-SAD-
C006.DOC"]{-
HYPERLINK-
"http://internal.mps.cardinal
.net/teams/qradocs/usdistrib
ution/SOPs/HSCSQRA/SA
D/HSCSQRA-SAD-
C006.DOC" }

Customer Visit Survey

[HYPERLINK
"https://my.cardinalhealth.net/CustomerVisit"]{-
HYPERLINK-
"https://my.cardinalhealth.net/CustomerVisit" }

Approvals on file in Healthcare Supply Chain Services (Transportation and Warehouse) Document Center

Approvers: Michael Mone

Owner: Nicholas Rausch
Doc Center: Jason Paul Snouffer

Change History

DCN-2290 12/22/08 Initial release of new procedure, HSCSQRA-SAD-C005.

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